

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 17-15041-AJC

In re:  
Peak Hotels and Resorts  
Group Ltd (Debtor)

CHAPTER: 7

**AFFIDAVIT**

Before me personally appeared RUSSELL B. ADLER, who after first being placed under oath, swears, or affirms as follows:

1. My name and firm address are:
  - a. Name: RUSSELL B. ADLER
  - b. Address: 8201 Peters Road Suite 1000 Plantation FL 33324
  - c. Law Firm: Law Offices of Russell B Adler, PA
2. I am an attorney licensed to practice law in Florida since 1986 and the President of the Law Offices of Russell B Adler, PA.
3. I am a member of the Federal and Bankruptcy Bars in and for the Southern District of Florida.
4. I have personal knowledge as to the facts and circumstances stated herein.
5. That although I have a law degree, I spend a majority of my time operating private or public business, as well as financial consulting for other businesses.
6. That I know Mr. Omar Amanat and was paid a retainer/fee; by Mr. Amanat for representation of Peak Hotels and Resorts Group, LTD., (hereinafter "Peak") in January 2014.

7. That in 2014, Mr. Amanat requested I review a real-estate transaction for Peak, including a contract for the purchase of some audio/visual equipment from High Def Zone.
8. That simultaneous with this engagement, I was also working for a family office on Miami Beach, evaluating various technologies for investment.
9. That shortly after my meeting with Mr. Amanat, my time requirements at family office significantly increased, as we acquired a set of European patents.
10. That the aforementioned patent acquisition required travel to Scotland and England, as part of the due diligence before investing in the project.
11. That as a result of my travels and prior commitments, I was unable to timely reconnect with Mr. Amanat and continue my representation of Peak.
12. Thereby I ended up retaining a portion of Peak's funds which were not expended during my representation.
13. That several months ago, Mr. Amanat made a specific inquiry, in reference to my representation back in 2014, of Peak.
14. Thereinafter a review of my records indicated my firm had not performed any additional work for Peak, after the initial consultation.
15. That based upon my aforementioned discontinuation of my representation, I still retained an unused portion of Peak's retainer.
16. That Mr. Amanat requested I refund the balance of Peaks retainer.
17. Thereby I had a check issued and sent to the Trustee.

*AFFIANT FURTHER SAYETH NOT*

X 

**RUSSELL B. ADLER**  
*Affiant/Defendant*

Sworn to (or affirmed) and subscribed before me,  
the undersigned authority, on August 28, 2017.


Personally known \_\_\_\_\_

Produced identification FL DL

Type of ID produced Driver License

/S/ \_\_\_\_\_

Notary Public, Deputy Clerk, or other authority.

  
NAME: Angela Paulino

Commission No. FF-081505

My Commission Expires: 1-19-2018

